

EXHIBIT 15

1 Q If they have a serious mental health and it's
2 manifesting itself in some loud ways.

3 A It would be a considering factor, yes.

4 Q Now, I understand there are -- you use
5 restraints from time to time. Can you tell me what
6 type of restraints are used and how an individual
7 would be subject to utilization of those types of
8 restraints?

9 A You're talking ambulatory restraints and
10 four-point restraints?

11 Q Are those the only two types? I have the use
12 of force application restraints policy if it will
13 help.

14 A Okay. So your question is?

15 Q What types of restraints are there? Start
16 with that.

17 A The two that we use are ambulatory restraints
18 and four-point restraints.

19 Q What about soft?

20 A That's been a long, long time since we used
21 soft restraints.

22 Q Okay. So there's three types. Well, two
23 types; ambulatory and four-point. Can you describe
24 each of those, the mechanics of where they're put? If
25 they're in their cell, if they're moved to another

1 A The soft restraints have not been used.

2 Q What about the leather?

3 A That's the soft. We call them soft
4 restraints. Most of your soft restraints they don't
5 hold anymore and we don't utilize them anymore. I
6 haven't seen soft restraints used in probably -- and
7 this again is a guess, probably ten years.

8 Q Okay. With regard to ambulatory restraints,
9 are they ever allowed out of the restraints to go to
10 the bathroom, to eat lunch, dinner, et cetera?

11 A They can eat with the restraints on. If they
12 need to go to the bathroom in ambulatory restraints,
13 they actually can go to the bathroom. In four-point
14 restraints, they cannot.

15 Now, if they actually cannot do it, they
16 can't actually reach back and maybe clean themselves,
17 then, yes, we will actually get a group of guys
18 together and go in and remove the restraints and have
19 them actually go to the bathroom.

20 Q And eating they can eat with the restraints?

21 A Restraints on.

22 Q And with the four points you have to let them
23 up to eat and to go to the bathroom?

24 A Yes.

25 Q And with regard to four-point restraints, is